

#### REGULATIONS FOR THE DEFENCE OF CLIENTS

## Purpose and Competencies of the Customer Service Department

**Article 1:** These Regulations for the Defence of Clients regulate the activity of the Customer Service of Housers Global Properties, S.L. (hereinafter, "**Housers**").

**Article 2**: Housers Customer Service has the purpose of attending to and resolving the complaints and claims presented by its clients, concerning the performance of Housers.

The Customer Service Department is autonomous and will therefore be separate from the other commercial or operational services provided by Housers to ensure that the Customer Service Department takes, in an autonomous manner, the decisions concerning the scope of its activity and thus avoid conflicts of interest.

**Article 3**: All persons who meet the condition of investor and user of Housers' services are entitled to file complaints and claims if they refer to their legally recognized interests and rights, whether derived from the contracts, from the applicable regulations, or, from the principle of fairness.

**Article 4**: The period for the submission of complaints and claims shall be two (2) years, counting from the date on which the customer became aware of the facts giving rise to the complaint or claim.

**Article 5**: The Customer Service Department shall have a period of two (2) months from the date of the complaint or claim submitted to it to decide on the procedure.

**Article 6**: All Housers' services and departments must provide Customer Service with any information requested by the latter concerning the exercise of its functions.

#### **Head of Customer Services**





**Article 7**: The head of the Customer Service Department shall be a person of good commercial and professional repute with adequate knowledge and experience to perform his or her duties.

Those who have a record of personal respect for commercial and other laws governing economic activity and business life, as well as good commercial and financial practices, are of good commercial and professional repute.

They have adequate knowledge and experience, those who have performed functions related to Housers' own activity.

**Article 8**: The Board of Directors of Housers will appoint the Head of Customer Service.

The CNMV's Complaints Service and the supervisory authority or authorities corresponding to their activity shall be notified of the designation of the Customer Care Service.

The designation as head of Customer Service will not be compatible with the performance of other activities within Housers. Consequently, no conflict of interest in a commercial matter or of any other nature may arise.

**Article 9**: The term of office of the Customer Service Representative shall be five (5) years and shall be tacitly renewed for periods of the same duration.

**Article 10**: The following shall be the causes of the incompatibility and ineligibility of the Customer Service Holder:

- Be unable to continue business following Article 13 of the Commercial Code.
- Simultaneously perform a job for financial institutions outside the group of Housers entities.
- Simultaneously hold the post of Customer Ombudsman or customer Service Manager, for any other entity whose activity is financial or banking.

**Article 11**: The Board of Directors of the institution shall dismiss the Head of Customer Services. The following shall be causes for dismissal of the Head of the Customer Service Department:

- Death
- Supervening incapacity
- Absolute incapacity for work for the usual profession.
- Resignation.
- Termination of the employment relationship with Housers.





- Loss of eligibility requirements.
- Incurring in any cause of incompatibility or ineligibility.
- Retirement or early retirement.
- By agreement of the Housers Board of Directors.

In the event of termination of the holder of the Customer Service, the Board of Directors of Housers will immediately proceed to the appointment of a new holder who meets the eligibility criteria set out in Article 7 of these Regulations.

Obligation to provide information and procedure for the submission, handling and resolution of complaints and claims

**Article 12**: Housers will make available to the Client, as well as on its website, the following information:

- a) The existence of the Customer Care Service, with an indication of its e-mail address.
- b) Housers' obligation to acknowledge receipt of a complaint and confirm whether it is admissible within ten working days of receipt.
- c) Deal with and resolve the complaints and claims presented by the Client, within two months of their presentation to the Customer Service Department.
- d) Reference to CNMV's Complaints Service, specifying its postal and e-mail addresses, and the need to exhaust the Customer Care Service channel to file complaints and claims with them.
- e) The Customer Ombudsman Regulations.
- f) References to transparency and customer protection regulations.
- g) A formal complaint form following the guidance of ESMA COMMISSION DELEGATED REGULATION (EU) 2022/2117 of 13 July 2022 supplementing Regulation (EU) 2020/1503 of the European Parliament and of the Council as regards regulatory technical standards specifying requirements, model formats, and procedures for the handling of complaints. ANNEX
- h) If the decision does not satisfy the complainant's claim or satisfies it only partially, a detailed explanation of this outcome shall be included, and the complainant shall be informed of the remedies available to him or her, such as the possibility of complaining with a competent authority following Article 38 of Regulation (EU) 2020/1503. or taking civil action.





- **Article 13**: Complaints and claims can be submitted to the Customer Service Department, at the e-mail address provided by the institution for this purpose.
- **Article 14**: The submission of complaints and claims may be made, in person or by proxy, by computer, electronic, or telematic means, if these allow the documents to be read, printed, and stored.
- (a) the conditions of admissibility of complaints;
- (b) information that complaints are filed and processed free of charge;
- (c) a detailed description of how complaints will be submitted, including:
- (i) information that complaints should be submitted using the standard template set out in the Annex;
- (ii) the type of information and evidence to be provided by the complainant;
- (iii) the identity and contact details of the person or department to whom complaints should be addressed;
- (iv) the platform, system, or e-mail address to which complaints shall be submitted;
- (i) the language or languages in which a complaint may be lodged under Article 3(2) of these Rules.
- (d) the process to be followed for handling complaints, as specified in Articles 4 to 6;
- (e) the time limit within which the complainant will be notified of the decision on the complaint.
- **Article 15**: The procedure shall be initiated by the submission of a document, following the official model attached as Annex, stating:
  - Name, surname(s), and address of the interested party and, if applicable, of the person representing him/her, duly accredited; national identity card number for natural persons and data referring to the public registry for legal entities.
  - Reason for the complaint or claim, with clear specification of the issues on which a ruling is sought.
  - Department or service where the facts that are the object of the complaint or claim have taken place.
  - The complainant is not aware that the subject matter of the complaint or claim is being substantiated through an administrative, arbitration, or judicial procedure.
  - Place, date, and signature.

The complainant shall provide, together with the above document, the documentary evidence in his/her possession on which his/her complaint or claim is based.





**Article 16**: Once the complaint or claim has been received by Housers, it will be forwarded to the Customer Service Department. Receipt will be acknowledged in writing and a record will be made of the date of submission to calculate the resolution period. This acknowledgment will confirm whether it is admissible within ten working days of receipt.

The acknowledgment of receipt of a complaint shall contain the following:

(a) the identity and contact details, including e-mail address and telephone number, of the person or department to whom complainants may address any queries relating to their complaint;

(b) a reference to the resolution period

Once the complaint or claim has been received by the Customer Service Department, a file will be opened.

If the identity of the claimant is not sufficiently accredited, or the facts that are the object of the complaint or claim cannot be established, the signatory will be required to complete the documentation submitted within ten (10) calendar days, with the warning that, if this is not done, the complaint or claim will be filed without further processing. The period used by the claimant to rectify these errors will not be included in the calculation of the two (2) month period that the Customer Service Department must issue a ruling on the complaint or claim.

**Article 17**: The Customer Service Department may only refuse to accept complaints or claims for processing in the following cases:

- When essential data is omitted for processing that cannot be rectified, including cases in which the reason for the complaint or claim is not specified.
- When they are intended to be processed as a complaint or claim, appeals or different actions that fall under the authority of administrative, arbitration, or judicial bodies, or the same is pending resolution or litigation or the matter has already been resolved in those instances.
- When the facts, reasons, and requests specifying the issues that are the subject of the complaint or claim do not refer to specific operations.
- When complaints or claims are formulated that reiterate other previously resolved complaints or claims presented by the same interested party concerning the same facts.
- When it becomes aware of the simultaneous processing of a complaint or claim and an administrative, arbitration, or judicial procedure on the same matter, the Customer Service Department will refrain from processing the former.





**Article 18**: Customer Service may request during the processing of the files, both from the claimant and from the different departments and services of Housers, as much data, clarifications, reports, or evidence as they consider relevant to adopt their decision.

**Article 19**: If, because of the complaint or claim, the entity rectifies its situation with the claimant to the latter's satisfaction, it must notify the competent body and justify this with documentary evidence, unless the interested party expressly withdraws. In such cases, the complaint or claim shall be filed without further action.

Interested parties may withdraw their complaints or claims at any time. Withdrawal shall result in the immediate termination of the procedure as far as the relationship with the data subject is concerned.

**Article 20**: The file will be finalized within a maximum period of two (2) months from the date on which the complaint or claim was submitted to the Customer Service Department.

The decision shall always be reasoned and contain clear conclusions on the request raised in each complaint or claim, based on the contractual clauses, the applicable rules, as well as good industry practice. If the decision deviates from the criteria expressed in previous similar cases, reasons shall be provided.

The decision shall expressly state the customer's right to appeal to CNMV's Complaints Service in the event of disagreement with the outcome of the decision.

Where, in exceptional situations, a decision on a complaint cannot be provided within the time limit referred to in Article 5, providers of equity finance services shall inform the complainant of the reasons for the delay and specify the time limit for making the decision.

Once the maximum period of two (2) months available to the Customer Care Service for resolving complaints and claims has expired, customers may submit their complaints and claims to the CNMV's Complaints Service.

**Article 21**: Annually, the Customer Service Department will present to the Board of Directors of Housers a report explaining the development of its function during the previous fiscal year, which must have the following minimum content:

- a) Statistical summary of the complaints and claims dealt with, with information on their number, admissibility, reasons for rejection, reasons and issues raised in the complaints and claims and amounts and amounts involved.
- b) A summary of the decisions taken, indicating whether they are favourable or unfavourable to the person concerned.
- c) The general criteria are contained in the decisions.





d) Recommendations or suggestions derived from their experience, to better achieve the aims that inform its actions.

**Article 22**: Any modification to these Client Protection Regulations must be made in writing and submitted to the Housers Board of Directors for approval and verification and will be notified on the website in a way that is easily accessible to investors.

**Article 23**: Housers is subject to the duty to respond, through a person designated for this purpose, to the requests that the Complaints Service of the CNMV may make in the exercise of its functions, within the periods determined following the provisions of its Regulations.

The Service and Housers will adopt the necessary agreements and will conduct the appropriate actions to facilitate that the transmission of data and documents that are necessary for the exercise of their functions is conducted by telematic means using electronic signature.

### **ANNEX**

# Model format for the submission of complaints

| LODGING A COMPLAINT   |  |
|---|--|
| (to be sent by the client to the crowdfunding service provider) |  |
|   |  |

Personal details of the complainant:

| SURNAME/NAME OF LEGAL            | NAME        |      | REGISTR | ATION NUMBER   |
|----------------------------------|-------------|------|---------|----------------|
| ENTITY                           |             |      | AND LEI | (IF AVAILABLE) |
|                                  |             |      |         |                |
|                                  |             |      |         |                |
|                                  |             |      |         |                |
|                                  |             |      |         |                |
| ADDRESS: STREET, NUMBER,         |             |      |         |                |
| FLOOR                            | POSTAL CODE | CITY |         | COUNTRY        |
| (of the registered office of the |             |      |         |                |
| companies)                       |             |      |         |                |
|                                  |             |      |         |                |





| TELEPHONE  |           |                               | E-M   | IAIL                                       |   |         |
|--|-----------|-------------------------------|-------|--|---|---------|
| 1.a Contact details (if dif                          | ferent fr | om those provide              | d und | der 1.a):                                  | · |         |
| SURNAME/NAME OF LEGAL ENTITY                         |           | NAME                          |       |  |   |         |
|  |           |                               |       |  |   |         |
|  |           |                               |       |  |   |         |
| ADDRESS: STREET, NUMBER, FLOOR                       |           | POSTAL CODE                   |       | CITY                                       |   | COUNTRY |
| (of the registered office of the                     |           |                               |       |  |   |         |
| companies)   |           |                               |       |  |   |         |
|  |           |                               |       |  |   |         |
|  |           |                               |       |  |   |         |
| TELEPHONE  |           |                               | E-M   | IAIL                                       |   |         |
| 2.a Personal details of th<br>document as proof of   |           | resentative's appo            | ointm | nent):                                     | , | -       |
| SURNAMES   |           | NAME/NAME OF THE LEGAL ENTITY |       | REGISTRATION NUMBER AND LEI (IF AVAILABLE) |   |         |
|  |           |                               |       |  |   |         |
| ADDRESS: STREET, NU FLOOR  (of the registered office |           | POSTAL CODE                   |       | CITY                                       |   | COUNTRY |
| companies)   |           |                               |       |  |   |         |





| TELEPHONE                          |                   | E-MAIL              |                                |  |  |
|------------------------------------|-------------------|---------------------|--------------------------------|--|--|
|                                    |                   |                     |                                |  |  |
| b Contact details (if different fr | om those provide  | d under 2.a):       |                                |  |  |
| SURNAME/NAME OF LEGAL ENTITY       |                   | NAME                |                                |  |  |
|                                    |                   |                     |                                |  |  |
|                                    |                   |                     |                                |  |  |
|                                    |                   |                     |                                |  |  |
| ADDRESS: STREET, NUMBER,           |                   |                     |                                |  |  |
| FLOOR                              | POSTAL CODE       | CITY                | COUNTRY                        |  |  |
| (of the registered office of the   |                   |                     |                                |  |  |
| companies)                         |                   |                     |                                |  |  |
|                                    |                   |                     |                                |  |  |
|                                    |                   |                     | 1                              |  |  |
| TELEPHONE                          |                   | E-MAIL              |                                |  |  |
|                                    |                   |                     |                                |  |  |
| nformation relating to the co      | mplaint           |                     |                                |  |  |
| .a Full reference of the investme  | ent or deal to wh | ich the claim relat | tes (i.e. investment reference |  |  |
| name of the project promo          |                   |                     |                                |  |  |
| transactions, etc.)                |                   |                     |                                |  |  |

1.b Description of the subject matter of the complaint (specify the subject matter of the complaint)

1.





| lease provide supporting documenta    | ation for the above-mentioned facts. |
|---------------------------------------|--------------------------------------|
| 1.c Date(s) of the event(s) giving ri | ise to the claim                     |
|                                       |                                      |
| 1.d Description of the damage, loss   | s, or harm caused (if applicable)    |
| ther comments or relevant informati   | ion (if applicable)                  |
| ther comments of relevant injurmati   | οπ (η αρριττάδιε)                    |
|                                       |                                      |
|                                       |                                      |
| In (Place)                            | on (date)                            |
|                                       | on (date)                            |
|                                       | on (date)                            |
|                                       | on (date)                            |
| In (Place)                            |                                      |





| Copy of the contractual documents for the investments that are the subject of the |  |
|---|--|
| claim   |  |
|   |  |
| Other supporting documents  |  |
|   |  |
|   |  |
|   |  |
|   |  |

